

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
WESTERN DIVISION**

LUCAS KIRKPATRICK

v.

ROBERT PETERSEN

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Case No. 3:22-CV-50274  
Honorable Philip G. Reinhard

**DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION**

All parties respectfully request an extension of time in which to complete fact and expert discovery in this action.

1. Lucas Kirkpatrick ("Plaintiff" or "Kirkpatrick") filed his complaint for breach of oral shareholder agreement on July 7, 2022 against Robert Petersen ("Petersen" or "Defendant") in Illinois State Court in McHenry County. Dkt. 1.
2. On August 5, 2022, Defendant removed the case to the Northern District of Illinois, Western Division.
3. On December 5, 2022, the Court entered the scheduling order in this case, and under that order, the parties are supposed to exchange Rule 26(a)(2)(C) disclosures by May 2, 2023, serve rule 26(e) supplements by May 2, 2023, and conclude fact discovery by June 2, 2023.
4. The parties have exchanged discovery, and Defendant has served discovery requests. However, due to outstanding conflicts, the parties are unable to complete depositions by June 2, 2023. The parties inability to complete depositions by the current deadline also hinders their ability to conduct expert discovery on the current schedule.

5. Accordingly, the parties respectfully request a 60-day extension for each of the deadlines in the Case Scheduling Order (Dkt. 23).

Dated: March 31, 2023

Respectfully submitted,

/s/ Michael C. Pomeroy

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**ATTORNEY FOR DEFENDANT  
ROBERT PETERSEN**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on March 31, 2023, a true and correct copy of the foregoing instrument was served to all counsel of record at their email addresses on file with the Court.

/s/ Michael C. Pomeroy

Michael C. Pomeroy